EXHIBIT A

HARRIS CORPORATIONS'S PROPOSED CONSTRUCTIONS AND INTRINSIC AND EXTRINSIC EVIDENCE CITATIONS FOR JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT (P.R. 4-3)

I.   Disputed Constructions – Case No. 18-cv-00439-JRG

A.   United States Patent No. 6,958,986

Claim Term	Claims[1]	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction[2]
"scheduling demand assigned time slots"	1, 5, 6, 9, 17, 21, 22, 25	"assigning time slots to be allocated among links or data priority levels responsive to utilization"	'986 Patent at Abstract; Figs. 5, 8, & 14-18; 1:8-11; 2;15-18; 2:27-33; 2:34-67; 3:65-4:8; 5:48-54; 5:56-6:19; 9:47-61; 13:14-18; 14:1-8; 15:44-45; 15:57-65; 18:28-41; 19:41-49; 26:30-33; 26:53-27:22; 28:28-39; 38:18-22; 38:30-33; 38:56-59; 39:10-25; 41:61-42:18; 42:19-37; 42:41-43:13; 49:45-49; 51:3-23; 51:50-54; 57:5-19; 57:54-63; 58:7-23, 59-11-24; 59:54-63; 60:4-18. U.S. Pat. App. Pub. No. 2003/0193908A1 at [0063]; [0076]	"assigning, responsive to utilization, time slots to nodes for which a semi-permanent time slot also is allocated"

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[1] Throughout this disclosure, patent claims that are unasserted or that only include a term by dependency are not listed.

[2] Huawei's proposed constructions are included here for reference. They are also listed, along with Huawei's citations to intrinsic and extrinsic evidence, in a separate Exhibit at Huawei's suggestion.

Claim Term	Claims[1]	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction[2]
"scheduling [a] respective semi-permanent time slot[s]"	1, 9, 17, 25	"assigning [a] time slot[s] reserved to given links or data priority levels"	'986 Patent at Abstract; Figs. 5-7 & 14-18; 2:23-27; 2:57-64; 5:16-30; 5:42-47; 7:50-57; 9:48-61; 10:52-60; 10:65-11:21; 13:14-18; 14:1-13; 16:1-16; 18:28-36; 18:55-62; 22:58-60; 23:50-55; 26:15-21; 39:10-18; 54:4-18; 57:5-19; 57:54-63; 58:7-23, 59-11-24; 59:54-63; 60:4-18.	"assigning [a] respective time slot[s] to neighboring mobile nodes, reserved across a series of frames,"
"link utilization metric[s]"	1, 5, 6, 9, 17, 21, 22, 25	"measure[s] of link quality or capacity associated with a communication link or data priority level"	'986 Patent at Abstract; Figs. 14-18; 2:27-67; 3:65-4:8; 4:23-32; 5:48-54; 5:56-6:19; 15:57-65; 38:18-26; 38:30-33; 38:51-39:9; 39:19-25; 39:29-35; 40:48-56; 40:60-41:31; 41:46-60; 41:61-42:18; 42:41-43:13; 43:45-52; 49:45-49, 50:28-34; 51:50-52:6; 52:63-66; 53:24-54:18; 57:5-19; 57:54-63; 58:7-23, 59-11-24; 59:54-63; 60:4-18. U.S. Pat. App. Pub. No. 2003/0193908A1 at [0076]; [0136] – [0143].	"measurement[s] of link usage or link demand"

B.   United States Patent No. 6,980,537

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"unit status message"	4, 18, 30, 33, 56, 61, 66	"status message or packet including connectivity information relating to node connections and tiers"	'537 Patent at Figs. 3, 4, & 9; 3:41-45; 5:34-38; 7:24-34; 7:37-42; 8:6-18; 8:60-66; 9:63-65; 10:15-16; 10:44-47; 11:55-59; 14:54-61; 15:38-48; 16:20-26; 16:27-52; ; 16:57-61; 17:44-46; 18:49-62; 22:31-36; 23:35-24:6; 24:11-28; 25:14-37; 26:15-37; 26:40-55; 27:37-55; 28:29-46; 28:57-29:6; 29:15-42; 29:45-30:5; 30:50-31:7; 31:10-36; 32:17-59; 32:62-33:35; 33:38-34:27; 34:30-43. '537 Patent FH, 5-6-05 Remarks at 29-36, 8-10-05 Notice of Allowability at 2-4.	"message containing connectivity information for that unit"

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Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"routing unit" / "relay unit"	1, 10, 11, 16, 24, 25, 30, 33, 36, 38, 39, 40, 45, 47, 48, 49, 54, 58, 59, 63, 64, 68	No construction necessary.	'537 Patent at 4:17-23; 11:39-41; 12:45-50; 23:5-21; 23:35-24:6; 24:11-28; 25:14-37; 26:15-37; 26:40-55; 27:37-55; 28:29-46; 28:57-29:6; 29:15-42; 29:45-30:5; 30:50-31:7; 31:10-36; 32:17-59; 32:62-33:35; 33:38-34:27; 34:30-43.	"a network node that relays traffic between at least two other units within the network"
"member unit"	1, 16, 30, 33, 36, 45, 54, 58, 59, 63	No construction necessary.	'537 Patent at 6:47-49; 10:35-37; 11:39-41; 12:45-50; 18:31-47; 23:35-24:6; 24:11-28; 25:14-37; 26:15-37; 26:40-55; 27:37-55; 28:29-46; 28:57-29:6; 29:15-42; 29:45-30:5; 30:50-31:7; 31:10-36; 32:17-59; 32:62-33:35; 33:38-34:27; 34:30-43.	"a node that does not relay network traffic"

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"designating as said routing unit each communication unit communicating with at least one neighboring unit isolated from communications with remaining neighboring units of that communication unit"	47	No construction necessary.	'537 Patent at Figs. 1A, 5, 6, & 8; 30:50-31:36.	"designating as said routing unit each communication unit that has at least one neighboring node that can establish communications with at least one other neighboring unit of that communication unit only through that communication unit"
"designating said communication unit as said routing unit in response to determining that said communication unit communicates with at least one neighboring unit that is isolated from communications with remaining neighboring units of said communication unit"	16	No construction necessary.	'537 Patent at Figs. 1A, 5, 6, & 8; 26:15-37.	"designating said communication unit as said routing unit if it has at least one neighboring node that can establish communications with at least one other neighboring unit of that communication unit only through that communication unit"
"designating said communication unit as said relay unit based on	59, 64	No construction necessary.	'537 Patent at Figs. 1A, 5, 6, & 8; 33:10-35; 34:7-27.	"designating said communication unit as said relay unit if it

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
said examination and in response to determining that at least one neighboring communication unit is required to utilize said communication unit to communicate with network communication units that are outside the range of and greater than one hop away from said neighboring communication unit" / " designate at least one communication unit as a relay unit to transfer network information based on said examination and in response to determining that said at least one communication unit is required to be utilized by at least one neighboring unit to communicate with communication units that are outside the range of and greater than one hop away from				has at least one neighboring node that can communicate with nodes more than one hop away from itself only through the communication unit"

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
said neighboring units"				
"designating said communication unit as a transmission routing unit in response to determining that said communication unit communicates with at least one neighboring routing unit that is isolated from communications with remaining neighboring routing units of said communication unit"	24	No construction necessary.	'537 Patent at Figs. 1A, 5, 6, & 8; 26:15-37; 27:37-55.	"designating said communication unit as a transmission routing unit if there is at least one neighboring routing unit of the communication unit that can establish communications with at least one other neighboring routing unit of that communication unit only through that communication unit"

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"designating as said transmission routing unit each communication unit that communicates with at least one neighboring routing unit isolated from communications with remaining neighboring routing units of that communication unit"	48	No construction necessary.	'537 Patent at Figs. 1A, 5, 6, & 8; 30:50-31:36.	"designating as said transmission routing unit each communication unit that has at least one neighboring routing unit of the communication unit that can establish communications with at least one other neighboring routing unit of that communication unit only through that communication unit"
"a [wireless] communications network"	1, 16, 30, 33, 36, 45, 54, 59, 64	No construction necessary.	'537 Patent at 20:41-54; 21:20-30; 23:35-24:6; 26:15-37; 28:29-46; 28:57-29:6; 29:15-42; 30:50-31:7; 32:17-59; 33:10-36; 34:7-27.	"a network of connected [wireless] devices"

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"connectivity information"	1, 4-5, 10-11, 16, 18-19, 24-25, 38-40, 47-49, 54, 56, 58-59, 61, 63-64, 66, 68	"topology information relating to node network connections and tier designations"	'537 Patent at Abstract, Figs. 3, 4, & 9; 1:22-31; 3:41-45; 4:17-21; 5:28-30; 5:34-38; 7:24-34; 7:37-42; 8:6-18; 8:60-66; 10:15-16; 10:44-47; 11:55-59; 14:54-61; 15:38-48; 16:20-26; 16:27-52; 16:57-61; 17:44-46; 18:49-62; 22:31-36; 23:35-24:6; 24:11-28; 25:14-37; 26:15-37; 26:40-55; 27:37-55; 28:29-46; 28:57-29:6; 29:15-42; 29:45-30:5; 30:50-31:7; 31:10-36; 32:17-59; 32:62-33:35; 33:38-34:27; 34:30-43. '537 Patent FH, 5-6-05 Remarks at 29-36, 8-10-05 Notice of Allowability at 2-4.	Plain and ordinary meaning

C.   **United States Patent No. 7,027,426**

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
Preamble	1, 8	No construction necessary.	'426 Patent at 7:32-52; 8:7-17.	The preambles are limiting
"at the source node, selecting a route to the destination node on at least one of the plurality of electrically separate channels"	1, 8	No construction necessary.	'426 Patent at 7:32-52; 8:7-17.	"at the source node, selecting one of a plurality of discovered routes to the destination node on at least one of the plurality of electrically separate channels"
"route selection unit to select a route to the destination node on at least one of the plurality of electrically separate channels"	18	No construction necessary.	'426 Patent at 8:51-67.	"route selection unit to select one of a plurality of discovered routes to the destination node on at least one of the plurality of electrically separate channels"

D.   **United States Patent No. 7,224,678**

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"monitoring transmissions among [ ] stations"	12, 17, 51, 56	"monitoring transmissions directly to or from one of the stations, as well as any transmission within operating range of the wireless network"	'678 Patent at 6:23-31.	Plain and ordinary meaning
Preamble	12, 51	No construction necessary.	'678 Patent at 12:41-55; 15:49-61	The preamble is limiting
"wireless local or metropolitan area network"	12, 51	No construction necessary.	'678 Patent at title, Abstract; Fig. 1-10; 1:8-10; 1:14-56; 2:33-48; 5:26-33; 5:45-6:7; 6:61-65; 7:21-23; 10:54-59; 11:12-25; 12:41-55; 15:49-61. Ser. No. 10/217,243 (Issues as U.S. Patent 7,327,690) IEEE Standards for Information Technology—Telecommunications and Information Systems—Local and Metropolitan Area Network—Specific Requirements—Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications, 1999 (HUAWEI-HARRIS_0137622-HARRIS_0138149)	Indefinite

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"wireless network"	12, 13, 17, 18, 19, 20, 56	No construction necessary.	'678 Patent at title, Abstract; Fig. 1-10; 1:8-10; 1:14-56; 2:33-48; 5:26-33; 5:45-6:7; 6:61-65; 7:21-23; 10:54-59; 11:12-25; 12:41-59; 13:27-46; 17:29-36. Ser. No. 10/217,243 (Issues as U.S. Patent 7,327,690) IEEE Standards for Information Technology—Telecommunications and Information Systems—Local and Metropolitan Area Network—Specific Requirements—Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications, 1999 (HUAWEI-HARRIS_0137622-HARRIS_0138149)	"a network of connected wireless devices"
"a policing station for detecting intrusions into the wireless network"	12	No construction necessary.	'678 Patent at 5:26-34; 6:15-16; 10:60-67; 11:18-25; 12:39-55.	"one or more wireless stations and/or base stations for detecting intrusions into the wireless network"

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"a number of failed attempts to authenticate a MAC address"	12, 51, 52	No construction necessary.	'678 Patent at Fig. 2, 12; 6:53-60; 9:14-23; 12:41-55; 16:50-67.	"one or more failed attempts to authenticate a MAC address"
"base station"	20	No construction necessary.	'678 Patent at Fig. 1; 1:14-33; 1:47-56; 5:45-51; 6:15-16; 12:41-55; 13:45-46 IEEE Standards for Information Technology—Telecommunications and Information Systems—Local and Metropolitan Area Network—Specific Requirements—Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications, 1999 (HUAWEI-HARRIS_0137622-HARRIS_0138149)	"wireless device that facilitates communications between other devices in the wireless network"

E.   United States Patent No. 7,327,690

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"collisions" "collisions of packets"	32, 34, 36, 40, 41, 71, 73, 75, 76, 78, 79	"transmissions that are simultaneous with or within a certain time of another transmission" "transmissions that are simultaneous with or within a certain time of another transmission of packets"	'690 Patent at Fig. 20; 5:29-31; 8:39-53; 10:34-44.	"transmissions that are simultaneous or too close together"

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
Preamble	32, 40, 71, 78	No construction necessary.	'690 Patent at 14:32-43; 15:4-17; 18:1-12; 18:36-46	The preamble is limiting
"wireless local or metropolitan area network"	32, 40, 71, 78	No construction necessary.	'690 Patent at title; Abstract; Fig. 1-10; 1:8-10; 1:14-56; 2:32-43; 5:38-46; 5:57-6:19; 7:6-10; 7:33-35; 10:64-11:2; 11:22-35; 14:32-43; 15:4-17; 18:1-12; 18:36-46. Ser. No. 10/217,042 (Issued as U.S. Patent 7,224,678) IEEE Standards for Information Technology—Telecommunications and Information Systems—Local and Metropolitan Area Network—Specific Requirements—Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications, 1999 (HUAWEI-HARRIS_0137622-0138149)	Indefinite

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"wireless network"	32, 33, 34, 36, 38, 39, 40, 41, 42, 43	No construction necessary.	'690 Patent at title; Abstract; Fig. 1-10; 1:8-10; 1:14-56; 2:32-43; 5:38-46; 5:57-6:19; 7:6-10; 7:33-35; 10:64-11:2; 11:22-35; 14:32-43; 15:4-17; 18:1-12; 18:36-46. Ser. No. 10/217,042 (Issued as U.S. Patent 7,224,678) IEEE Standards for Information Technology—Telecommunications and Information Systems—Local and Metropolitan Area Network—Specific Requirements—Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications, 1999 (HUAWEI-HARRIS_0137622-0138149)	"a network of connected wireless devices"

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Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"greater than about three"	34, 41, 73, 76, 79	No construction necessary. Alternatively, if the Court determines a construction is necessary, "greater than three"	'690 Patent at 4:10-12.	Indefinite
"a policing station for detecting intrusions into the wireless network"	32, 40	No construction necessary.	'690 Patent at 5:38-46; 6:27-28; 11:3-10; 11:28-35; 14:32-44; 15:4-17.	"one or more wireless stations and/or base stations for detecting intrusions into the wireless network"
"monitoring transmissions among said plurality of stations"	32, 40, 71, 78	"monitoring transmissions directly to or from one of the stations, as well as any transmission within operating range of the wireless network"	'690 Patent at 6:35-43.	Plain and ordinary meaning
"a threshold number of collisions of packets having the predetermined packet type"	32, 71	No construction necessary except for "collisions of packets" element, which should be construed as proposed above.	'690 Patent at Fig. 20; 5:29-31; 8:39-53; 10:34-44; 14:32-43; 18:1-12	"one or more instances of packets of a predetermined type being transmitted simultaneously or too close together"

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"threshold number of collisions of a same MAC address"	36, 40, 75, 78, 79	No construction necessary except for "collisions" element, which should be construed as proposed above.	'690 Patent at Fig. 20; 5:29-31; 8:39-53; 10:34-44; 14:53-62; 15:4-17; 18:22-31; 18:36-50.	"one or more instances of at least two stations using the same MAC address simultaneously or relatively closely to one another"
"base station"	22	No construction necessary.	'690 Patent at Fig. 1; 1:14-33; 1:47-56; 5:57-63; 6:24-28; 13:40-42 IEEE Standards for Information Technology—Telecommunications and Information Systems—Local and Metropolitan Area Network—Specific Requirements—Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) Specifications, 1999 (HUAWEI-HARRIS_0137622-HARRIS_0138149)	"wireless device that facilitates communications between other devices in the wireless network"

F.   United States Patent No. 7,440,572

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"encrypting both address and data information"	1, 47	"reversibly encoding information from both address and data portions of a message or payload to protect from reading without decryption"	'572 Patent at Abstract, Figs. 7 & 8, 2:7-16, 2:51-55; 4:20-30; 5:31-41; 6:13-17; 6:34-39; 7:12-16; 7:50-64; 8:44-56; 9:32-46; 10:22-36; 11:1-12; 12:9-13. '572 FH, 11-15-07 Remarks at 15-18; 2-25-08 Office Action at 2-7; 5-23-08 Remarks at 16-17.	"reversibly encoding both MAC address and MAC data information to protect from reading without decryption"
"decrypting both [the] address and [the] data information upon reception"	1, 47	"recovering, upon reception, both [the] address and [the] data information that was encrypted"	'572 Patent at Abstract, Figs. 7 & 8, 2:7-16, 2:51-55; 4:20-30; 5:31-41; 6:13-17; 6:34-39; 7:12-16; 7:50-64; 8:44-56; 9:32-46; 10:22-36; 11:1-12; 12:9-13. '572 FH, 11-15-07 Remarks at 15-18; 2-25-08 Office Action at 2-7; 5-23-08 Remarks at 16-17.	"recovering, upon reception, both [the] MAC address and [the] MAC data information that was encrypted"

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"by at least adding a plurality of encrypting bits to both the address and the data information"	1, 47	"by at least combining a plurality of encrypting bits with information from both address and data portions of a message or payload"	'572 Patent at Abstract; Figs. 7 & 8; 2:7-16; 2:32-35; 4:20-30; 5:26-30; 5:31-41; 5:42-45; 6:13-17; 7:12-16; 7:50-64; 8:11-13; 8:22-26; 9:1-3; 9:12-16; 9:57-59; 10:1-5; 10:44-46; 11:26-28; 12:9-13. '572 FH, 11-15-07 Remarks at 15-18; 2-25-08 Office Action at 2-7; 5-23-08 Remarks at 16-17.	Plain and ordinary meaning
"a cryptography circuit … [connected to said]/[cooperating with the] MAC … for encrypting both address and data information"	1, 47	No construction necessary except for terms contained within the proposed term that are discussed above, which should be construed as proposed above.	See above.	"a cryptography circuit … [connected to said]/[cooperating with the] MAC … for reversibly encoding both MAC address and MAC data information to protect from reading without decryption"

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Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"a cryptography circuit … [connected to said]/[cooperating with the] MAC … for decrypting both address and data information"	1, 47	No construction necessary except for terms contained within the proposed term that are discussed above, which should be construed as proposed above.	See above.	"a cryptography circuit … [connected to said]/[cooperating with the] MAC … for recovering both MAC address and MAC data information that was encrypted"

II.   Disputed Constructions – Case No. 19-cv-00222-JRG

A.   United States Patent No. RE44,325

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"producing at least one test signal" / "producing at least first and second test signals"	30, 48, 50, 57	"producing at least one alternating current test signal" / "producing at least first and second test signals wherein at least one of said first and second test signals is an alternating current test signal"	'325 Patent at Figs. 2-3, 5-9; 3:20-30; 8:50-62; 9:23-30; 10:44-58; 13:39-65; 16:45-60; 20:59-21:60 US Pat. No. 6,715,087 File History, Application at 4:12-5-8, 24:31-25:28; Response to Office Action at 2; Request for Certificate of Correction; Director's Report. RE'325 File History, 2007-03-06 Remarks at 2, 15-19; 2007-04-17 Final Rejection; 2007-10-17 Remarks at 2-4; 2008-05-19 Appeal Brief; 2008-12-09 Examiner's Answer at 2-10; 2009-02-09 Reply Brief; 2009-10-13-09 Patent Board Decision; 2011-11-09 Non-Final Rejection; 2012-05-09 Remarks at 22-26; 2012-07-04 Remarks at 20-23; 2012-08-01 Final Rejection at 3. IEEE 100, The Authoritative Dictionary of IEEE Standards Terms, Seventh Edition, 2000 at pp. 28-29, 312, 314 (definitions of	Plain and ordinary meaning

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
			"alternating current (ac), alternating-current signal, direct current (dc), direct-current signal). G. Vergnaud, *et. al.*, Proposal for a discovery process, Alcatel, March 10, 2000 (HARRIS-H_222-011750). G. Vergnaud, *et. al.*, DTE Power via MDI, Alcatel, May 25, 2000 (HARRIS-H_222-011759). G. Vergnaud, *et. al.*, DTE Power via MDI Discovery Process, Alcatel, Sept. 12, 2000 (HARRIS-H_222-011773). IEEE 802.3 – DTE Power over MDI Working Group, Draft proposed text for DTE Power section, Alcatel, June 21, 2000 (HARRIS-H_222-011648). Robert Leonowich, IEEE 802.3af DTE Power via MDI Resistive Signature and Detection Protocol Follow-up, Lucent Technologies, July 11, 2000 (HARRIS-H_222-011691).	

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
			Richard Glaser, *et al.*, IEEE 802.3af DTE Power via MDI Detection and Signature Protocol, Lucent Technologies, April 18, 2000 (HARRIS-H_222-011675). Robert Leonowich, IEEE 802.3af DTE Power via MDI Detection and Signature Tutorial, Lucent Technologies, July 10, 2000 (HARRIS-H_222-011739). Minutes of the IEEE 802.3af task force meeting in La Jolla CA, July 11- 12, 2000 (HARRIS-H_222-01171). Minutes of the Power via the MDI Task Force, New Orleans, LA, September 12-13, 2000 (HARRIS-H_222-011720). Minutes of the IEEE 802.3af DTE Power Meeting in Tampa Florida, November 7, 2000 (HARRIS-H_222-011731).	

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"having an energy such that the terminal cannot be damaged under any circumstances"	30, 48, 50, 57	Indefinite.	'325 Patent at 2:48-52; 4:31-35; 5:25-30; 16:48-52; 17:49-53; 20:40-45; 22:28-34; 22:53-57; 23:24-28. US Pat. No. 6,715,087 File History, Application at 3:25-37; Response to Office Action at 2. RE'325 File History, 2007-03-06 Remarks at 2, 15-19; 2007-04-17 Final Rejection; 2007-10-17 Remarks at 2-4; 2008-05-19 Appeal Brief; 2008-12-09 Examiner's Answer at 2-10; 2009-02-09 Reply Brief; 2009-10-13-09 Patent Board Decision; 2011-11-09 Non-Final Rejection; 2012-05-09 Remarks at 22-26; 2012-07-04 Remarks at 20-23; 2012-08-01 Final Rejection at 3.	"having an energy such that the terminal is not damaged by the test signal[s] regardless of whether the terminal is adapted to receive a remote power feed"

B.   United States Patent No. 8,416,892

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"wherein the number of preambles generated from a single root sequence is Npre $= \lfloor N_{NC}/N_{CS} \rfloor$ "	4	Indefinite.	3GPP TSG RAN WGl Meeting #49, Rl-072325 (Huawei-439_0010202). 3GPP TSG RAN WGl Meeting #50, Rl-073515 (Huawei-439_0010255)	"wherein the number of preambles generated from a single root sequence is Npre$= \lfloor N_{ZC}/N_{CS} \rfloor$ "
"x u,v(k)=x u,v((k+$v N$CS)mod NZC)"	6, 15	No construction necessary.	'892 Patent, 2:1-4; 9:55-64; 10:52-64 '892 File History, 2011-11-08 Specification and Claims at 2, 15 '892 File History, 2012-01-18 Certified Copy of Foreign Priority Application at 2 '892 File History, 2012-05-16 Claims at 2, 4 '892 File History, 2012-10-25 Claims at 2, 4; 2012-11-19; Claim Amendments at 2, 4 '892 File History, 2013-02-08 Post Allowance Communication at 1	"x u,v(k)=x u((k+$v N$CS)mod NZC)"

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
			Invention Disclosure Form (Huawei-439_0016127) 3GPP TSG RAN WG1 meeting #48bis, R1-071408 (HARRIS-H_222-009968) 3GPP TSG RAN WG1 meeting #49, R1-072325 (Huawei-439_0010202) 3GPP TSG RAN WG1 meeting #49, R1-072324 (HARRIS-H_222-013445)	

C.   **United States Patent No. 8,798,575**

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"[determining / determine] a charging method and charging rules in response to a service request or other trigger event"	1, 16	"[determining / determine] a charging method" = "determining whether the charging method is online charging or offline charging" "[determining / determine] . . . charging rules in response to a service request or other trigger event" = Indefinite.	'575 Patent at Abstract, Figs. 2A and 2B; 3:27-54, 4:4-13, 7:54-60; 8:35-61; 9:1-20; 9:66-10:22; 10:54-59; 10:65-11:35 '575 File History, 2010-06-02 Amendment '575 File History, 2011-02-15 Appeal Brief Amendment 3GPP TS 23.125 V6.0.0 (2004-03) Responsive Claim Construction brief of T-Mobile et al, 2:16-cv-00055-JRG-RSP, Dkt. 126 at 27-30; Ex. F; Ex. G; Ex. K. Memorandum Opinion and Order on Claim Construction, E.D. Tex. Case No. 2:16-CV-00055-JRG-RSP, May 17, 2017 (Huawei-439_0008955). 4/13/2017 Xiaoqin Duan Deposition Transcript Vol 2 (Huawei-439_0009759).	Plain and ordinary meaning

D.   United States Patent No. 9,838,851

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"[setting / set] a first subframe to null"	1, 5	"muting a particular subframe without interfering with transmission of surrounding or associated subframes or radio blocks"	'851 Patent at Abstract; Fig. 1; 5:36-62; 5:63-67; 6:41-7:2; 7:3-18; 9:27-60; 10:20-43; 11:38-48; 12:19-25; 12:26-38; 12:56-67; 13:1-6; 13:25-27; 13:61-14:9; 14:10-12; 14:13-42; 14:43-61; 14:62-64; '851 File History, 2016-01-16 Final Rejection at 2-8; 2017-01-16 Remarks at 4-5; 2017-03-20 Remarks at 4-5; 2017-04-07 Non-Final Rejection at 2-8; 2017-07-05 Remarks at 2-6; 2017-08-01 Notice of Allowability. 3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Evolved Universal Terrestrial Radio Access (E-UTRA) and Evolved Universal Terrestrial Radio Access Network (E-UTRAN); Overall description; Stage 2 (Release 9), 3GPP TS 36.300 V9.0.0, June 2009 (HARRIS-H_222-000276). 3rd Generation Partnership	"set[ting] a first subframe such that the first subframe does not interfere with DSI in subframes transmitted by other eNBs"

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
			Project; Technical Specification Group Radio Access Network; Introduction of the Multimedia Broadcast Multicast Service (MBMS) in the Radio Access Network (RAN); Stage 2 (Release 8), 3GPP TS 25.346 V8.3.0 March 2009 (HARRIS-H_222-000001).	

E.   United States Patent No. 10,117,226

Claim Term	Claims	Harris Proposed Construction	Harris Intrinsic and Extrinsic Evidence	Huawei Proposed Construction
"a same scheduling period in which another base station resumes sending the multimedia broadcast multicast service data in [a same multimedia broadcast multicast service single frequency network (MBSFN) area / the same MBSFN area]"	1, 6, 11	Indefinite. Alternatively, "a same scheduling period in which it is determined that another base station resumed sending the multimedia broadcast multicast service data in [a same multimedia broadcast multicast service single frequency network (MBSFN) area / the same MBSFN area]"	'226 Patent at Abstract; Figs. 1, 2, 3d, 4, 8, 10 & 11; 2:58-65; 3:12-26; 4:51-56; 5:14-15; 5:16-30; 6:13-24; 9:4-13; 14:32-40; 15:47-65; 17:15-28; 17:51-18:2; 18:26-43. '226 File History, 2016-07-01 Claims at 30-31; 2018-02-08 Non-Final Rejection at 6-12; 2018-06-14 Notice of Allowability at 2-3; 2018-04-27 Claims at 2.	Plain and ordinary meaning